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May 14, 2002

Electronic Filing
Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte Contact:
Second Joint Application of BellSouth For Authorization Under Section 271 Of The Communications Act To Provide In-Region, InterLATA Service In The States Of Georgia and Louisiana. CC Docket No. 02-35

Dear Ms. Dortch:

On Monday May 13, 2002, Len Cali, David Eppsteiner and I met with Commissioner Michael Copps and Jordan Goldstein, Commissioner Copps' Legal Adviser, regarding the above referenced proceedings. In that meeting, we reiterated AT&T's opposition to BellSouth's application for all of the reasons articulated by AT&T in its Comments, Reply Comments and ex parte filings in this docket. In particular, we focused on UNE rate, and OSS change management issues. During the meeting, we discussed AT&T's April 19, 2002 *ex parte* submission and distributed AT&T's May 10, 2002 and May 13, 2002 *ex parte* filings which explain why BellSouth cannot be heard to claim that it has addressed the OSS deficiencies discussed in AT&T's previous filings in this matter. In addition, later in the afternoon, I sent Mr. Goldstein copies of the attached data.

The positions expressed by AT&T during the meeting were consistent with those contained in the Comments and ex parte filings previously made in each of these dockets. One copy of this Notice is being submitted in accordance with the Commission's rules.

Sincerely,

Enclosure
cc: Commissioner Michael Copps
Jordan Goldstein

Status of Change Requests (CRs) prioritized in April 2001

Summary

	Implemented	Scheduled for Implementation in 2002	Cancelled	Not Scheduled	Total
BellSouth	0	6	2	6	14
CLECs	4	6	1	11	22
Total	4 (11%)	12 (33%)	3 (8%)	17 (47%)	36

Status of Change Requests (CRs) prioritized in April 2001

Rank	CR #	BST/CLEC	Implemented	Target Implementation
1	040	CLEC	Partially	5/18 11/16
2	365	CLEC	No	5/18
3	EDI-005	CLEC	Cancelled	N/A
4	135	CLEC	No	Not Sched.
5	096	CLEC	Yes	N/A
6	145	BST	No	5/18
7	020	CLEC	No	5/18
8	215	CLEC	No	11/16
9	361	CLEC	Yes	N/A
10	029	BST	No	7/13
11	038	BST	No	5/18
12	241	BST	No	7/13
13	137	CLEC	Yes	N/A
14	196	BST	No	7/13
15	078	CLEC	No	5/18
16	146	BST	No	5/18
17	003	CLEC	No	Not Sched.
18	351	BST	No	Not Sched.
19	113	CLEC	No	Not Sched.
20	144	BST	Cancelled	N/A
21	186	CLEC	No	Not Sched.
22	085	BST	No	Not Sched.
23	160	CLEC	No	7/13
24	336	BST	No	Not Sched.
25	367	CLEC	No	Not Sched.
26	101	CLEC	No	Not Sched.
27	104	CLEC	No	Not Sched.
28	016	CLEC	Yes	N/A
29	178	BST	No	Not Sched.
30	221	BST	No	Not Sched.
31	127	CLEC	No	Not Sched.
32	273	CLEC	No	Not Sched.
33	179	BST	No	Not Sched.
34	176	CLEC	No	Not Sched.
35	181	BST	Cancelled	N/A
36	088	CLEC	No	Not Sched.

	Total #	Type 4 - BST	Type 5 = CLEC	Type 2 = Reg
New	29	10	19	
Pending	17	7	10	
Candidate Request	32	11	17	4
Scheduled	15	4	10	1
Total	93	32	56	5

(3 were Type 5 & 1 wa

is Type 4)

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Attachment 38

Change Control Process Back Log

Overall Feature Change Request Back Log 2/20/02¹

Change Request Status	Number of Change Requests in Back Log	Submission Date of "Oldest" Request in Back Log
New	29	8/00
Pending	17	9/00
Candidate Request	32	8/99
Scheduled	15	8/99
Total	93	-

New – Indicates a Change Request has been received by the BellSouth Change Control Manager ("BCCM") but has not been validated. The interval for validation is 10 business days.

Pending – Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review and prioritization. Change Review occurs at each monthly status meeting, prioritization occurs in March, June, August and December.

Candidate Request – Indicates a Change Request has completed the Change Review and prioritization process and is ready to be scheduled to a release.

Scheduled – Indicates a Change Request has been scheduled for a release.

¹ All information summarized here was obtained from the BellSouth Change Control Log provided to the CLECs by e-mail on February 20, 2002.

Change Control Process Back Log

New Status Back Log Detail

New - Indicates a Change Request has been received by the BellSouth Change Control Manager ("BCCM") but has not been validated. The interval for validation is 10 business days.

Change Request #	Type	Submission Date
132	5	8/00
222	5	11/00
243	5	12/00
320	5	2/01
357	5	3/01
400	5	5/01
404	5	5/01
443	5	6/01
446	5	7/01
461	4	8/01
466	5	8/01
468	4	8/01
477	5	8/01
487	5	9/01
505	4/2	9/01
506	4/2	9/01
586	5	1/02
587	5	1/02
622	5/2	1/02
623	5/2	1/02
644	5	2/02
645	4/2	2/02
646	4	2/02
647	4	2/02
651	4/2/5	2/02
652	4/2/5	2/02
653	4	2/02
654	5	2/02
655	5	2/02
TOTAL = 29	Type 5 = 19 Type 4 = 10	

Type 4 = BellSouth Initiated

Type 5 = CLEC Initiated

Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)

12 New Status Change Requests listed in the Change Request Log were excluded from this analysis because they were either still "new" because of CLEC inactivity or were requesting changes to the CCP.

Change Control Process Back Log

Pending Status Back Log Detail

Pending — Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review and prioritization. Change Review occurs at each monthly status meeting, prioritization occurs in March, June, August and December.

Change Request #	Type	Submission Date	Status Date
184	5	9/00	10/00
246	5	12/00	1/01
284	5	1/01	2/01
345	5	3/01	5/01
353	5	3/01	4/01
392	5	5/01	6/01
399	5	5/01	6/01
408	4	5/01	6/01
426	4	6/01	7/01
439	4	7/01	7/01
440	4	7/01	7/01
465	4	8/01	9/01
518	4/2	10/01	10/01
534	4	10/01	11/01
541	5/2	11/01	11/01
563	5/2	12/01	12/01
629	5	2/02	2/02
Total = 17	Type 5 = 10 Type 4 = 7		

Type 4 = BellSouth Initiated

Type 5 = CLEC Initiated

Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)

2 Pending Status Change Requests listed in the Change Request Log were excluded from this analysis because they were requesting changes to the CCP.

Change Control Process Back Log

Candidate Request Status Back Log Detail

Candidate Request -- Indicates a Change Request has completed the Change Review and prioritization process and is ready to be scheduled to a release.

Change Request #	Type	Submission Date	Status Date
3	5/2	3/00	4/01
53	5	5/00	9/00
85	4	6/00	4/01
88	5/2	6/00	4/01
101	5	7/00	4/01
104	5	7/00	4/01
113	5	7/00	4/01
127	5	8/00	4/01
135	5	8/00	4/01
139	4	8/00	4/01
144	4	8/00	4/01
160	5/2	8/00	4/01
176	5	9/00	4/01
178	4	9/00	4/01
179	4	9/00	4/01
180	4	9/00	4/01
181	4	9/00	4/01
186	5	9/00	4/01
215	5	11/00	4/01
221	4	12/00	4/01
228	4/2	12/00	4/01
273	5/2	1/01	4/01
314	5	2/01	4/01
315	5	2/01	4/01
336	4	3/01	4/01
351	4	3/01	4/01
364	5	8/99	4/01
367	5	8/99	4/01
491	2	9/01	NA
492	2	9/01	NA
495	2	9/01	NA
496	2	9/01	NA
Total = 32	Type 5 = 17 Type 4 = 11 Type 2 = 4		

Type 4 = BellSouth Initiated

Type 5 = CLEC Initiated

Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)

Change Control Process Back Log

Scheduled Status Back Log Detail

Scheduled – Indicates a Change Request has been scheduled for a release.

Change Request #	Type	Submission Date	Status Date	Target Date	Interval (Months -1)
16	5	4/00	12/01	3/02	22
20	5	5/00	12/01	5/02	23
29	5/2	5/00	2/02	7/02	25
38	4	5/00	12/01	5/02	23
40	5	5/00	1/02	2/02-4/02-11/02	20 - 22 - 29
78	5/2	6/00	12/01	5/02	22
96	5	6/00	12/01	3/02	20
137	5/2	8/00	12/01	3/02	18
145	4	8/00	12/01	5/02	20
146	4	8/00	12/01	5/02	20
196	4	10/00	2/02	7/02	20
241	5	12/00	2/02	7/02	18
365	5	8/99	12/02	5/02	32
368	5	8/99	12/02	5/02	32
494	2	9/01	12/01	5/02	7
Total = 15	Type 5 = 10 Type 4 = 4 Type 2 = 1				

Type 4 = BellSouth Initiated

Type 5 = CLEC Initiated

Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)

1 Scheduled Change Request listed in the Change Request Log were excluded from this analysis because it requests the addition of LENS to CAVE.